

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 3:14-cv-30100-MGM

FAITH JOHNSON,

Plaintiff

v.

AMHERST NURSING HOME, INC. D/B/A  
CENTER FOR EXTENDED CARE AT  
AMHERST, KEENA KEERNAN and RASIDI  
AKODO,

Defendants

**PLAINTIFF'S EMERGENCY MOTION TO EXTEND SERVICE OF PROCESS  
DEADLINE FOR THE INDIVIDUAL DEFENDANT RASIDI AKODO BY NINETY (90)  
DAYS**

NOW COMES the Plaintiff, Faith Johnson ("Plaintiff"), in the above-captioned matter and hereby respectfully requests that the deadline for the completion of service of process on the individual Defendant, Rasidi Akodo ("Defendant Akodo"), be extended by ninety (90) days from September 26, 2014 to, and including, December 26, 2014.

AS GROUNDS therefor, the Plaintiff states the following:

1. The current deadline for completion and filing of service of process on the Defendants is Friday, September 26, 2014.
2. Service on the Corporate Defendant and the Individual Defendant Keeran were accomplished, via sheriff, on June 13, 2014 and the executed summonses reflecting the same were filed with the Court on June 20, 2014.

3. Currently, Plaintiff's Counsel only has a possible post office box address for the Defendant Akodo and has requested a post office box check from the Hampshire County Sheriff's Department. Said request is still pending at this time.
4. Plaintiff's Counsel has attempted to obtain a last known residential address for the Defendant Akodo from Defendants' Counsel. However, Defendants' Counsel has indicated that they are unable to disclose the same to Plaintiff's Counsel at this time.
5. Plaintiff's Counsel does not currently have a residential address to properly serve the Defendant Akodo.
6. Plaintiff's Counsel is requesting a ninety (90) day extension of time in order to gain a proper address for which to serve the Defendant Akodo.
7. Plaintiff's Counsel attempted to confer with Counsel for the Corporate Defendant and the individual Defendant Keeran via email on September 19, 2014 but to no avail.

WHEREFORE, the Plaintiff respectfully requests that the deadline to accomplish service of process on the Defendant Akodo be extended by ninety (90) days from September 26, 2014 to, and including, December 26, 2014.

Respectfully submitted,

The Plaintiff  
FAITH JOHNSON  
By Her Attorney

/s/ Michael O. Shea  
MICHAEL O. SHEA, ESQ.  
BBO No. 555474  
Law Office of Michael O. Shea, P.C.  
3 Crane Park Drive, Suite 7  
Wilbraham, MA 01095  
Telephone: (413) 596-8005  
Facsimile: (413) 596-8095  
Email: [owenshea@aol.com](mailto:owenshea@aol.com)

Dated: September 19, 2014

LOCAL RULE 7.1 CERTIFICATION

I, Michael O. Shea, Esq., Co-Counsel for the Plaintiff, hereby certify that I attempted to confer with Counsel for the Corporate Defendant and the Individual Defendant Keeran pursuant to Local Rule 7.1 via email on September 19, 2014 in an attempt to narrow the issues contained in the within Motion but to no avail.

/s/ Michael O. Shea  
Michael O. Shea

CERTIFICATE OF SERVICE

I, Michael O. Shea, hereby certify that on the 19<sup>th</sup> day of September, 2014, I served the foregoing document by electronic filing through the ECF system to Counsel of Record for the Defendants.

/s/ Michael O. Shea  
Michael O. Shea